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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91213310
Party	Defendant Riesett, Sandra L.
Correspondence Address	DONNA M.D. THOMAS ASTRACHAN GUNST THOMAS RUBIN, P.C. 217 E REDWOOD ST FL 21 BALTIMORE, MD 21202-3305 UNITED STATES dthomas@agtlawyers.com, mbetz@agtlawyers.com
Submission	Answer
Filer's Name	Donna M.D. Thomas
Filer's e-mail	dthomas@agtlawyers.com, mbetz@agtlawyers.com
Signature	/donna md thomas/
Date	01/09/2014
Attachments	AnswerToOpposition.pdf(672419 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of trademark application Serial No. 85/794867
For the Mark SHOW YOUR SOFT SIDE
Published in the Official Gazette on May 7, 2013

Mayor and City Council of Baltimore

Opposer,

v.

Sandra L. Riesett,

Applicant

Opposition No.91213310

**APPLICANT SANDE RIESETT'S ANSWER TO OPPOSER'S NOTICE OF
OPPOSITION**

Applicant Sande Riesett (hereinafter, "Riesett"), by counsel, answers the notice of opposition filed by Opposer, Mayor and City Council of Baltimore (hereinafter, the "City of Baltimore") as follows:

Statement of Facts

1. Riesett denies the allegations in paragraph one.
2. Riesett admits that on or about October 8, 2010, the City of Baltimore enacted Ordinance 10-369 to create the Mayor's Anti-Animal Abuse Advisory Commission (the "Commission"). Riesett lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph two, and on that basis, denies such allegations.
3. Riesett denies the allegations in paragraph three.
4. Riesett denies the allegations in paragraph four.

5. Riesett admits that she attended a meeting of the Commission on March 9, 2011, and that during that meeting she introduced herself by discussing her experience and credentials. Riesett denies the remaining allegations in paragraph five.

6. Riesett denies the allegations in paragraph six.

7. Riesett admits that on December 5, 2012, she filed an application in her own name with the United States Patent and Trademark Office to register the trademark SHOW YOUR SOFT SIDE. Riesett lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph seven, and on the basis denies the remaining allegations in paragraph seven.

8. Riesett denies the allegations in paragraph eight.

9. Riesett denies the allegations in paragraph nine.

10. Riesett denies the allegations in paragraph ten.

11. Riesett denies the allegations in paragraph eleven.

12. Riesett denies the allegations in paragraph twelve.

13. Riesett denies the allegations in paragraph thirteen.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

Riesett owns the applied-for trademark SHOW YOUR SOFT SIDE.

SECOND DEFENSE

The City of Baltimore has no rights in the trademark SHOW YOUR SOFT SIDE and any prior license to use such mark has been revoked. The City of Baltimore has no standing to oppose Riesett's application to register SHOW YOUR SOFT SIDE.

THIRD DEFENSE

The City of Baltimore's claims are barred, in whole or in part, under the doctrines of waiver, estoppel, acquiescence and/or laches.

Date: January 9, 2014

Respectfully submitted,



DONNA M.D. THOMAS
JAMES B. ASTRACHAN
Astrachan Gunst Thomas, P.C.
217 E. Redwood Street, 21st Floor
Baltimore, MD 21202
410-783-3550
410-783-3530 (fax)
jastrachan@agtlawyers.com
dthomas@agtlawyers.com

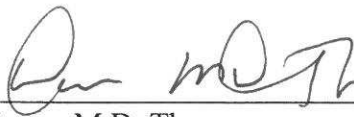
Attorneys for Applicant

CERTIFICATE OF SERVICE

The undersigned, a member of the Maryland Bar, hereby certifies that on this 9th day of January, 2014, she caused a copy of the foregoing Answer to Notice of Opposition to be served via first class mail, postage prepaid on:

Suzanne Sangree, Chief Solicitor
Patrick D. Sheridan, Assistant Solicitor
Baltimore City of Law Dept.
100 N. Holliday St., Room 109
Baltimore, MD 21202

Attorneys for Opposer



Donna M.D. Thomas